

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 *Attorney for Plaintiff Angela Bangert*

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Angela Bangert,

14 Plaintiff,

15 v.

16 Trans Union, LLC et al,

17 Defendants.

Case No.: 2:22-cv-01418-RFB-BNW

**Motion for an extension of time for
Defendant Experian Information
Solutions, Inc. to respond to
Plaintiff's complaint**

18 Angela Bangert (“Plaintiff”), by and through counsel, hereby requests
19 an extension of time for Experian Information Solutions, Inc. (“Defendant”) to
20 respond to the complaint. Defendant’s responsive pleading is currently due on
21 September 30. This is the first request for an extension of this deadline.

22 The extension is sought because the parties are engaged in active
23 settlement discussions that may alleviate Defendant’s need to retain counsel
24 and appear in this case.

25 ///

26 ///

27 ///

1 In good faith and not for the purposes of delay, Plaintiff submits this
2 motion, on behalf of Defendant, and requests that this Court extend
3 Defendant's deadline to file its responsive pleading until on or before **October**
4 **30, 2022.**

5 Dated: September 30, 2022.

6 **KIND LAW**

7 /s/ Michael Kind

8 Michael Kind, Esq.

9 8860 South Maryland Parkway, Suite 106

10 Las Vegas, Nevada 89123

11 *Attorney for Plaintiff Angela Bangert*

12
13 IT IS SO ORDERED:

14 

15 _____
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: October 3, 2022
18
19
20
21
22
23
24
25
26
27